

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MARCELLUS GILREATH,)	CASE NO.: 1:23-cv-00720
)	
Plaintiff,)	
)	JUDGE DAN AARON POLSTER
vs.)	
)	
PAMELA MCGUINEA, et al.,)	
)	
Defendants.)	
)	
)	

DEFENDANTS' FED.R.CIV.P. 26(a) DISCLOSURES

Now comes Defendant Cuyahoga County and submits the following initial disclosures pursuant to Rule 26(a) of the Federal Rules of Civil Procedure:

Rule 26(a)(1)(A)(i) – (iv); INITIAL DISCLOSURES

A. Individuals likely to have discoverable information that the Defendants may use to support their defenses (other than for impeachment):

1. **Plaintiff;** Plaintiff is anticipated to be able to provide discoverable information as to the factual allegations of Plaintiff's Complaint, including but not limited to the history of his benefits received from the County and the Veterans Administration; the fraud investigation; his indictment by the grand jury; his guilty plea; and the subsequent vacation of his sentence. Plaintiff is also anticipated to be able to provide discoverable information as to his alleged damages.

2. **Pamela McGuinea;** Former Cuyahoga County JFS Fraud Investigator and named Defendant who likely has discoverable information as to the factual allegations of Plaintiff's Complaint, including but not limited to the JFS Investigation of Plaintiff for potential benefits fraud and the grand jury proceedings. May be contacted through counsel.

3. **Amanda Jones;** Current Manager of the Cuyahoga County Shared Services Investigation Division, who likely has discoverable information as to the factual allegations of Plaintiff's Complaint, including but not limited to the reopened fraud investigation against Plaintiff and the functions of the Investigation Division generally. May be contacted through counsel.

4. **Jamie Gregorski;** former JFS Fraud Investigator, who likely has discoverable information as to the factual allegations of Plaintiff's Complaint, including but not limited to the reopened fraud investigation and the functions of the Investigation Division generally.

5. **Robert McEvoy;** former Manager of the Cuyahoga County Shared Services Investigation Division, who likely has discoverable information as to the factual allegations of Plaintiff's Complaint, including but not limited to the reopened fraud investigation and the functions of the Investigation Division generally.

6. **Simeon Best;** former Supervisor to Defendant Pamela McGuinea, who likely has discoverable information as to the factual allegations of Plaintiff's Complaint, including but not limited to Ms. McGuinea's initial investigation into Plaintiff for potential benefits fraud and the grand jury proceedings.

7. Other employees of the Cuyahoga County Shared Services Investigation Division.

8. Cuyahoga County Custodial Recordkeepers, who may locate and access documents; and

9. Any party identified in Plaintiff's Complaint, Rule 26(a)(1) disclosures, in response to Interrogatories, in documents produced in response to Requests for Production of Documents, or in response to any other discovery requests.

10. Other witnesses whose identities are presently unknown.

B. Disclosure of Documents

1. Correspondence between Plaintiff and County employees identified above;
2. Correspondence between County employees regarding their investigations of Plaintiff for potential benefits fraud;
3. Documents submitted to the Cuyahoga County Prosecutor's Office in connection with prosecution of Plaintiff in 2012-2013.
4. Documents submitted to or collected by the Investigation Division as part of the investigations into Plaintiff's SNAP benefits;
5. Personnel Files of current or former Cuyahoga County employees; and
6. Cuyahoga County policies and procedures, and training materials.

C. Calculation of Damages

Not applicable to these Defendants.

D. Insurance Agreements

Not applicable to these Defendants.

Respectfully submitted,

MICHAEL C. O'MALLEY, Prosecuting Attorney
of Cuyahoga County, Ohio

By: /s/ Michael J. Stewart

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*Attorneys for Defendants Cuyahoga County
and Pamela McGuinea*

CERTIFICATE OF SERVICE

On this 18th Day of August, the following was served on Plaintiff by electronic mail:

Brian Bardwell
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Counsel for Plaintiff

/s/ Michael J. Stewart
Michael J. Stewart (0082257)